

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

Christina Kinnamon, individually and	)	
on behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	
v.	)	Case No: 4:16-cv-646 JAR
	)	
Ditech Financial LLC,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION FOR LEAVE TO FILE ITS REPLY BRIEF IN SUPPORT OF  
ITS MOTION FOR SUMMARY JUDGMENT UNDER SEAL**

Defendant Ditech Financial LLC (“Ditech”), through its undersigned counsel, respectfully moves this Court pursuant to Local Rule 83-13:05(A) for leave to file its Reply Brief In Support of Its Motion for Summary Judgment (“Reply”) under seal.

1. Defendant’s Reply relies on reports, declarations, and deposition testimony that has been designated as “CONFIDENTIAL.” According to the Protective Order, documents designated “CONFIDENTIAL” must be filed under seal. Doc. 21 at ¶13.

2. Local Rule 83-13:05(A) provides that the Court may order that documents be received and maintained by the clerk under seal upon a showing of good cause.

3. Good cause exists in this instance for the Court to receive the documents under seal because the Reply includes citations to documents that are properly designated as “CONFIDENTIAL” pursuant to the Protective Order in this case. *See* Doc. No. 21. Further,

Section VI(B) of the Court's Administrative Procedures for Case Management/Electronic Case Filing allows for the provisional sealing of materials pending the Court's ruling on this motion.

4. Ditech is filing a redacted version of the Reply today, which is not under seal.

WHEREFORE, Ditech respectfully requests that the Court grant its Motion for Leave to File its Reply Brief In Support Of Its Motion For Summary Judgment under Seal.

Respectfully submitted,

/s/ Charles N. Insler

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*Of Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of July, 2018, I have caused a true and correct copy of the foregoing Defendant's Motion for Leave to File its Reply Brief In Support Of Its Motion For Summary Judgment Under Seal to be served on the following counsel:

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/s/ Charles N. Insler  
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